

Attorney Declaration of Lyle D. Rowen  
Case No. 23-cv-3652 (VSB)(SLC)

**EXHIBIT G**



January 28, 2022

Jon Chaney  
30 MAUJER ST APT 3F  
BROOKLYN, NY 11206-7651

SERVICE EMPLOYEES  
INTERNATIONAL UNION  
CTW, CLC

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MANNY PASTREICH  
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Virginia 202.387.3211

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Stamford 203.674.9965

District 1201  
215.923.5488

Florida District  
305.672.7071

Hudson Valley District  
914.328.3492

Mid-Atlantic District  
215.226.3600

National Conference of  
Firemen and Oilers  
606.324.3445

New England District 615  
617.523.6150

New Jersey District  
973.824.3225

Western Pennsylvania District  
412.471.0690

[www.seiu32bj.org](http://www.seiu32bj.org)

**Complaint Id:** 87299-21  
**Work Location:** 350 West 53rd Street  
**Employer:** AKAM ASSOCIATES, INC.

Dear Brother/Sister:

We have carefully reviewed the facts and circumstances surrounding your grievance and have determined that it lacks sufficient merit for the Union to be likely to prevail in arbitration. For that reason, it is not in the interest of the Union and its membership to carry this case forward to arbitration.

If you wish to appeal this decision not to arbitrate your complaint to the Union's Grievance Appeal Board, you must send the Union a written appeal explaining why you believe your complaint has merit within (21) days of the date of this letter. Please address your appeal to:

**Attention: Anna Skorupa**  
**The Grievance Appeal Board**  
**SEIU Local 32BJ, 5th Floor**  
**25 West 18th Street**  
**New York, N.Y. 10011-4676**

If you send in a timely appeal, you will have an opportunity to explain to the Grievance Appeal Board, at a hearing on a date to be scheduled later, why you believe your complaint should be arbitrated. If you do not appeal, your complaint will be closed.

Very truly yours,

Anna Skorupa

cc: Shriley Aldebol, Vice President



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March 9, 2022

Jon Chaney  
30 MAUJER ST APT 3F  
BROOKLYN, NY 11206-7651  
[vandgchaney@icloud.com](mailto:vandgchaney@icloud.com)

**Complaint Id:** 87299-21  
**Member:** Jon Chaney  
**Work Location:** 350 West 53rd Street

Dear Jon Chaney:

A GAB hearing has been scheduled regarding your complaint at the following location:

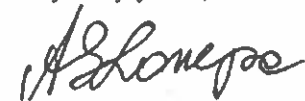
**Your hearing will take place via phone or video conference. Your Grievance Representative will contact you with the call-in information before the scheduled meeting.**

The date and time of the hearing is:

**Wednesday, March 23, 2022 1:00 PM**

It is important that you attend this hearing and send with you any documentation or information that will assist you and the Union in the review of this grievance to Anna Skorupa via email at [Anna.Skorupa@seiu32bj.org](mailto:Anna.Skorupa@seiu32bj.org) by no later than two days before your scheduled hearing.

Very truly yours,

  
Anna Skorupa

cc: Grievance Rep: Gene Szymanski



4/6/2022

Jon Chaney  
30 MAUJER ST APT 3F  
BROOKLYN, NY 11206-7651

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Dear Brother/Sister:

The Local 32BJ Joint Executive Board adopted the recommendation of the Grievance Appeal Board regarding your appeal.

Your appeal has been denied based on the determination that the complaint lacks sufficient merit for the Union to be likely to prevail in arbitration.

In Solidarity,

A handwritten signature in black ink, appearing to read "Shirley Aldebol".

Shirley Aldebol  
Vice President

cc: Anna Skorupa, Assistant to the Director  
Gene Szymanski, Grievance Representative